

ROBERT W. LYONS (45548)
LAW OFFICES OF ROBERT W. LYONS
295 West Winton Avenue
Hayward, California 94544
Telephone (510) 782-6161
Facsimile (510) 782-3519

Attorney for Defendant
Perry Mosdromos

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PERRY MOSDROMOS,

Defendant.

Case No.: 3:12-cr-00690-CRB

STIPULATION AND [PROPOSED] ORDER
TO CONTINUE STATUS CONFERENCE
AND EXCLUSION OF TIME UNDER THE
SPEEDY TRIAL ACT [18 U.S.C. §3161]

The parties by and through their counsel of record, hereby stipulate to the following: The parties have jointly agreed that the current status conference hearing date of Wednesday, June 12, 2013 at 2:00 p.m., be continued to Wednesday, July 24, 2013 at 2:00 p.m. The reason for this continuance is that defense counsel and Assistant United States Attorney, Kevin Barry need additional time for further investigation.

For the factual reason above, the parties agree that the time between June 12, 2013 and July 24, 2013 shall be excludable from the Speedy Trial Act requirements of Title 18, United States Code, Sections 3161 (h)(7)(A) and 3161(h)(7)(B)(iv).

The parties agree that the time is excludable in that the ends of justice served by granting the continuance of the status conference to July 24, 2013 outweigh the best interests of the public and the defendant in a speedy trial. The parties agree that a continuance of the status conference to July 24, 2013 is necessary to ensure both effective case preparation and the availability of defense counsel, and denial of such a continuance would unreasonably deny STIPULATION AND [PROPOSED] ORDER TO CONTINUE STATUS CONFERENCE AND EXCLUSION OF TIME

defendant effective case preparation and continuity of counsel pursuant to 18 U.S.C.

§§3161(h)(7)(A) and 3161(h)(7)(B)(iv).

Date: June 10, 2013

/s/Robert W. Lyons

Robert W. Lyons
Attorney for Jennipher Hernandez

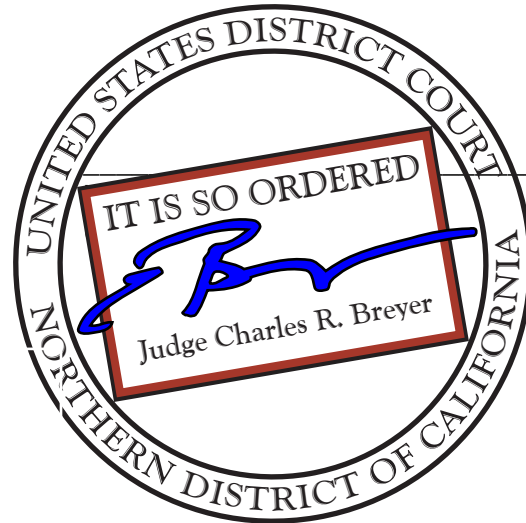
Date: June 10, 2013

/s/Kevin J. Barry

Kevin J. Barry
Assistant United States Attorney

IT IS SO ORDERED.

Date: June 11, 2013



STIPULATION AND [PROPOSED] ORDER TO CONTINUE STATUS CONFERENCE AND EXCLUSION OF TIME